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**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF WYOMING**

UNITED STATES OF AMERICA,

Plaintiff,

v.

GIBSON CONDIE,

Defendant.

Case No. 17-CR-124-J

**MOTION TO EXTEND TIME TO FILE ALL NON-DISCOVERY PRETRIAL
MOTIONS**

Defendant, Gibson Condie, by and through his attorneys, Stephen H. Kline and William B. Pilger, respectfully moves the Court for an extension of time to file all Non-Discovery Pretrial Motions up to October 13, 2017. Counsel for the Defendant has conferred with counsel for the United States, and counsel for the United States has indicated that he does not object to the Motion. In support thereof, Defendant states as follows:


1. On July 11, 2017, the United States District Court for the District of Wyoming filed its Scheduling and Discovery Order establishing a date of September 18, 2017 for the

filing of all non-discovery pretrial motions, including a bill of particulars pursuant to Rule 7(f) of the Federal Rules of Criminal Procedure.

2. Counsel for Defendant requests an extension of time in the amount of twenty-five (25) days to file any such motions up to and through October 13, 2017.
3. Counsel for the Defendant conferred with Counsel for the United States on September 12, 2017 via phone and counsel for the United States does not object to this Motion.
4. No other extensions of time have been filed in this matter.
5. The Defendant is charged with 234 counts of Medicaid fraud. Discovery production is still ongoing and is extensive enough that Defendant was required to purchase a one-terabyte hard drive to store the discovery. Additional discovery has been produced as late as today's date.
6. The Defendant has not had the opportunity to fully explore the appropriateness of all pretrial motions.
7. The parties are presently engaged in ongoing plea negotiations, and a more detailed understanding of the discovery is necessary before any agreement may be reached.
8. Accordingly, the Defendant requests an extension of time of twenty-five (25) days, to October 13, 2017, to file any non-discovery pretrial motions.

WHEREFORE, Defendant, Gibson Condie, by and through Counsel, respectfully requests an extension of time through October 13, 2017 to file all Non-Discovery Pretrial Motions.

DATED this 12th day of September, 2017.



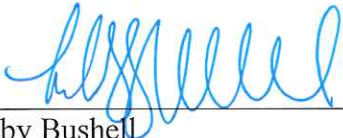
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CERTIFICATE OF SERVICE

I certify the foregoing pleading was served on this 12th day of September, 2017, and that
copies were served as follows:

Eric J. Heimann
U.S. Attorney's Office
P.O. Box 668
Cheyenne, WY 82003-0668

☒ ECF/CM
☐ E-Mail
☐ Overnight Delivery
☐ U.S. Mail



Libby Bushell